

UNITED STATES DISTRICT COURT

NORTHERN

DISTRICT OF ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA

F I L E D
v.
KODICHINMA OBUMNEME

DEC 17 2007

KC FILED

DEC 17 2007

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

CRIMINAL COMPLAINT

CASE NUMBER:

07CR 0845

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

MAGISTRATE JUDGE SCHENKIER

I, Krystle Intoe, being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about December 14, 2007 in Cook county, in the Northern

District of Illinois defendant KODICHINMA OBUMNEME did

knowingly and intentionally possess with intent to distribute, one kilogram or more of mixtures containing heroin, a Schedule I Narcotic Drug Controlled Substance,

in violation of Title 21 United States Code, Section(s) 841(a)(1).

I further state that I am a(n) Special Agent with the Department of Homeland Security and that this complaint is

Official Title

based on the following facts:

See attached affidavit

Continued on the attached sheet and made a part hereof: X Yes No


Signature of Complainant

Sworn to before me and subscribed in my presence,

December 17, 2007

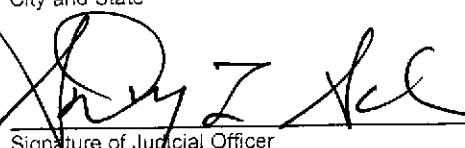
Date

at Chicago, Illinois

City and State

Sidney I. Schenkier, U.S. Magistrate Judge

Name & Title of Judicial Officer


Signature of Judicial Officer

STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

AFFIDAVIT

I, Krystle L. Intoe, being duly sworn on oath, state as follows:

1. I am a Special Agent with the Department of Homeland Security, U.S. Immigration and Customs Enforcement ("ICE") and have been so employed since April 2006. My primary duties consist of investigating criminal violations of the federal controlled substance laws, including, but not limited to, Title 21, United States Code, Sections 841, 843, and 846. I am an investigative or law enforcement officer of the United States, within the meaning of Title 18, United States Code, Section 2510(7); accordingly, I am an officer of the United States who is empowered by law to conduct investigations of, and make arrests for, offenses enumerated in Title 18, United States Code, Section 2516.
2. I am currently assigned to the office of the Resident Agent in Charge ("RAC"), Chicago O'Hare International Airport. During the course of my employment, I have received specialized training and have experience in investigating violations of the immigration, import and export laws of the United States, including violations involving the illegal importation of narcotics. Specifically, I have received training in the smuggling of narcotics across the United States borders and the methods used to traffic narcotics into the United States.
3. This affidavit is submitted for the limited purpose of establishing probable cause in support of the attached complaint. I learned the facts set forth herein from my own

personal knowledge or information provided to me by other ICE Agents and other law enforcement officers. It contains only a summary of the facts and is not intended to be a detailed account of everything known about the individual and events described herein.

4. On December 14, 2007, at approximately 12:00 p.m., ICE Agents and Task Force Officers ("Officers") from the RAC O'Hare Office approached a Silver Dodge Nitro, bearing Ontario (Canada) plate #ATLY 223, which was parked on N. Wilson Avenue, facing eastbound, near Clarendon Avenue. The vehicle was occupied by a single black male, later identified as Kodichinma OBUMNEME. A review of OBUMNEME's passport indicated that OBUMNEME is a Canadian citizen.

5. Agents and Officers approached the parked vehicle and identified themselves as law enforcement officers. Agents and Officers sought consent to search the vehicle. OBUMNEME gave the Agents and Officers consent both orally and in writing. OBUMNEME was escorted to the rear of the vehicle.

6. A search of the vehicle yielded two packages constructed of gray duct tape, approximately 1 foot by 1 foot in size, and between $\frac{1}{2}$ to 1 inch thick. These packages were found on the back seat of the vehicle, located inside a plastic bag, which was contained within another plastic bag, which contained various personal items belonging to OBUMNEME, including a Bible with his name on it. One of the packages was opened and field-tested by Agents and Officers on the scene. The field test yielded positive results for the properties of narcotics. A subsequent field test yielded positive results for the properties of heroin. The packages were weighed and determined to be approximately 1095 grams, which, in my experience, is a quantity indicative of distribution rather than personal use.

7. A further search of the vehicle revealed a rental contract from Avis Rental in the name of OBUMNEME. The rental contract indicated that the aforementioned Dodge Nitro vehicle was rented from Howard Johnson, 226 Queens Street East, Brampton, Ontario, Canada, on December 12, 2007, at 3:02pm. The contract further indicated the method of payment used was an American Express credit card, ending in 1004, in the name of OBUMNEME.

8. An inventory of items contained within OBUMNEME's personal effects revealed the same American Express credit card, ending in 1004, and in the name of Kodichinma OBUMNEME.

9. A review of Immigration and Customs Enforcement records indicated that OBUMNEME entered the United States on December 12, 2007, at approximately 10:10pm, via the Detroit Ambassador Bridge port of entry.

10. Based upon the facts set forth in this affidavit, I believe there is probable cause to believe that Kodichinma OBUMNEME knowingly possessed with the intent to distribute, approximately 1095g of heroin, a Schedule I Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

FURTHER AFFIANT SAYETH NOT

Krystle I. Intoe
Krystle I. Intoe
Special Agent
U.S. Immigration and Customs Enforcement

Subscribed and sworn
Before me this 17th day of December

2007

Sidney I. Schenckier

U.S. Magistrate Judge Sidney I. Schenckier